

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

CAROL TURNER,  
*Plaintiff,*

vs.

ENCOMPASS INDEMNITY COMPANY,  
*Defendant.*

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Civil Action No. \_\_\_\_\_

**JURY REQUESTED**

**SUPPLEMENTAL JS 44 CIVIL COVER SHEET; TO BE  
USED WHEN FILING A REMOVAL OF CASE**

THIS FORM MUST BE FILED WITH THE UNITED STATES DISTRICT  
CLERK'S OFFICE ON THE FIRST BUSINESS DAY FOLLOWING THE  
FILING OF THE NOTICE OF REMOVAL.

Additional Sheets May be Used as Necessary.

This Form Must be signed by Attorney of Record for Removing Party.

Was Jury Demand Made in State Court?      X   Yes                             No

If "Yes," by which party, and on what date?

Plaintiff Carol Turner  
Parties

September 28, 2021  
Date

**STYLE OF ORIGINAL PETITION**

(Please include all Plaintiffs, Defendants, and Intervenorors still remaining in the case. Also, please list the attorney(s) of record for each party names, and include the attorney's firm name, mailing address, and phone number (including area code).)

Cause No. 2021CV03507; *Carol Turner v. Encompass Indemnity Company*; at Law No.  
2 in County Court of Bexar County, Texas

Party

Carol Turner

**Plaintiff**

Attorney(s)

Andrew E. Toscano  
State Bar No. 00786832  
GENE TOSCANO, INC.  
846 Culebra Road  
San Antonio, Texas 78201  
Telephone: 210-732-6091  
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Encompass Indemnity Company

**Defendant**

Edward J. Batis, Jr.  
State Bar No. 01915470  
ORTIZ & BATIS, P.C.  
10100 Reunion Place, Suite 600  
San Antonio, Texas 78216  
Telephone: 210-344-3900  
Facsimile: 210-366-4301  
[ejbsupport@ob-lawpc.com](mailto:ejbsupport@ob-lawpc.com)

COUNTERCLAIMS, CROSS CLAIMS AND/OR THIRD PARTY CLAIMS

(Please list separately each counterclaim, crossclaim, or third-party claim still remaining in the case, and designate the nature of each such claim. For each counterclaim, crossclaim, or third-party claim, please include all Plaintiffs, Defendants, and Intervenor(s) still remaining in the case. Also, list the attorney(s) of record for each party named, and include the attorney's firm name, mailing address, and phone number (including area code).)

N/A-None

11/04/2021

Date



\_\_\_\_\_  
Signature of Attorney in Charge for  
Removing Party